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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**RECEIVED**

OCT 14 2022

MB

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Cook County Department of  
Corrections, Cook County  
Department of Corrections Cermak,

John Doe Doctor, Jane -

Doe Nurse Individually and in

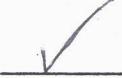
their official capacities

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

Case No: \_\_\_\_\_  
(To be supplied by the Clerk of this Court)

Jordan Jalil Curry  
22-cv-5679  
Judge Edmond E. Chang  
Magistrate Judge Susan E. Cox  
PC 2  
RANDOM

**CHECK ONE ONLY:**



**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)**



**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)**



**OTHER (cite statute, if known)**

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

A. Name of case and docket number: N/A

B. Approximate date of filing lawsuit: N/A

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A

D. List all defendants: N/A

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): \_\_\_\_\_

F. Name of judge to whom case was assigned: N/A

G. Basic claim made: N/A

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A

I. Approximate date of disposition: N/A

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**I. Plaintiff(s):**

- A. Name: Jordan Jalpi Curry
- B. List all aliases: Jordan Allen
- C. Prisoner identification number: Z0191118164
- D. Place of present confinement: Cook County Department of Corrections
- E. Address: 2700 S California Ave Chicago IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: John Doe  
Title: Doctor  
Place of Employment: Cook County Department of Corrections Drg Medical
- B. Defendant: Jane Doe  
Title: Nurse  
Place of Employment: Cook County Department of Corrections Drg Nurse
- C. Defendant: Cook County Department of Corrections Cermak  
Title: Cermak Health Services  
Place of Employment: Cook County Department of Corrections

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

Z.5 Jordan Curry #20191118164

Plaintiff

- A. Name: Jordan Jori Curry
- B. Last All Aliases: Jordan Allen
- C. Prisoner Identification Number: 20191118164
- D. Place Of Present Confinement: Cook County department of Corrections
- E. Address: 2700 S California Ave Chicago IL 60608

Defendant(s)

D

- Defendant: Cook County department of Corrections
- Title: Cook County department of Corrections
- Place of Employment: Cook County department of Corrections

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#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

In the month of November 2020, I noticed dark "purple-ish Spots" as I would describe them forming on my left inner thigh, so I began dropping (turning in) medical slips to see the doctor, I filled these forms out for weeks before I was finally seen by an DR<sup>#1</sup> & Nurse<sup>#2</sup>, I do not know her name but (she's an older lady, talks with an accent, Brown skin, short hair in Afro style) I believe she's African or Jamaican. She asked me what's my medical concern, I quickly told her that "purple-ish spots" were forming on my left inner thigh and they itch and hurt, she told me let her see, this Jane Doe DR<sup>#1</sup> & Nurse<sup>#2</sup> stood approximately 9 feet away from me and took a quick look at the spots and handed me the Anti-fogis cream she already had in her hand, she instructed me to use the anti-fogis cream everyday after I shower and let it air dry before putting on my DDC pants, I followed her instruction's for two weeks with no sign's of the spots clearing up, so I filled out another medical slip to see the DR<sup>#1</sup> & Doctor. After weeks of filling out medical forms and complaining to SGts and Nurses during med call, I was seen again by the same Jane Doe DR<sup>#1</sup> & Nurse<sup>#2</sup>, I explained to her I did what she told me and there's no sign of the spots getting better, she look around in her medical cart and pulled out a small tube of hydrocortisone cream, she tells me to use it everyday

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After I shower and let it dry before putting my pants on, Again I did as I was instructed to do, and again nothing happened so I filled out another medical slip to see the Dr. q Doctor, They ran sick call every other day but I was never called, so I complained again to the nurses at sick call, to my tier officer's and the Gt's (white shirts) when they would make their rounds, then I was seen by Dr. q Nurse Muhammad, I explained to her that these spots are spreading and they itch and burn and leaks a clear puss sometimes Dr. q Nurse Muhammad put her gloves on and took a look and put her gloves on and felt the spots, she told me that these spots are not a rash and she would put me in to see the Dr. q Doctor as soon as possible, As I wait to see the doctor the days turns to weeks and I was in constant pain and discomfort daily, I would ask the nurse for pain pills and be denied because I had to see the doctor before they could give me any pain medication during this waiting period to see the Dr. q Doctor these dark (purple-ish) spots started to spread and become larger and turn into something like a scab, so I began filling out medical health forms again, after being ignored again, I wrote a detailed inmate grievance form on 07/21/21 explaining my health issue and my frustrations with Dr. q medical staff, after my grievance was filed a few days later I was seen by the John Doe Dr. q Doctor (Caucasian male, late 40's or early 50's, ~~over 50~~ years old, glasses, dark colored hair with strings of grey). This John Doe Dr. q Doctor took a look at my thigh and then took the device from the wall that doctors use to look in people ear's and looked at the dark purple-ish colored

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Spots again, he placed the device back on the wall and said, Well I can tell you this is not a rash and I'm actually curious, to find out what this is, I said Well do you test me for Cancer and diabetes, they run on both sides of my family and this have me worried John Doe Dr a Doctor replied No I'm not going to waste my time because I'm 100 percent sure that's not the problem But I'm going to order you a new cream to try, lets see does this help before sending you out to "John H. Stroger, Jr. Hospital of Cook County" the cream he ordered me is called Triamcinolone Acetonide Ointment USP, 0.1% Net lot 15g Per Rego this John doe doctor told me if the cream doesn't work, he would put me on to see a skin doctor at John H Stroger Jr. Hospital of Cook County, he instructed me to use the cream everyday after I shower and whenever I feel it dry, I did as I was instructed again nothing happened so I began failing out more medical steps to see the Dr - John Doe Doctor again This time he took another look and told me keep using the Triamcinolone Acetonide Ointment, I did and then on 6/28/21 I wrote another inmate Grievance form explaining how I have been failing out Medical steps since Nov 2020 about these dark colored (purple-ish) spots on my left inner thigh and I was told I could see a Doctor (Skin Doctor) at John H. Stroger Jr.

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J Curry #20191118169

Revised 9/2007

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Hospital of Cook County but the Problem is that was months ago  
and I still havent been by a Professional At John H Stroger Jr Hospital  
of Cook County to find out what these spots are. I also state that since Dr  
a Doctor (John Doe) or Nurses cannot figure out what these spots are and Im still  
Waiting to see someone I feel as my health is being Jeopardy, because these  
Spots Could be skin cancer or something of that Nature, I Repeatedly filled out  
Medical forms again and complained to the Nurses, and Writeshorts then again  
on 8/19/21 I wrote another Grievance stating I have been failing at medical  
sites for almost a year about Dark Colored Spots on my leg, I Explained  
These Spots Bleed and puss comes out, they are hard and the Doctor and  
2 Nurses agree its not a fash and that I had a appointment Scheduled  
for sometime in July 2021 but I was not transported or Notified why I was  
Not transported over to John H Stroger Jr Hospital. I also stated that the  
Cream I was given does not work and Im in pain everyday and need help.  
A few days later on 8/26/21 1 to 3 Shift I was transported to John  
H Stroger Jr Hospital around 11 Am, I sat Blue Boxed and shackled and cold in  
the Bullpen in the Basement of the Hospital for Hours before being told that  
My clinic was going to reschedule me, because they close in 30 minutes and they  
dont have anyone to take me up Stairs to my clinic. I Spoke with (Sgt Crook or  
Cook) "He said they only had 1 team to transport the 25 Detainee's they had  
Scheduled that day to these Clinic's". He also states that he ~~sends~~ emails  
Over to Germack telling them they need to assign more people to transport

Statement of Claim PAGE 8 J. Curley 20191118164

Detainee's to and from their Clinics on time, and they still over Schedule detainees eachday without enough officers to transport them up and down the stairs. So this results in a bunch of time wasted, I received a response from LT Wcas (Cermak) on 9/15/21 the response said "Ex-ops handles being Escorted to from and during visits to Stroger's (John H. Stroger, Jr. Hospital of Cook County) this request will be forwarded to them for further review. I respectfully appealed and said "this keeps happening you guys are something to many Detainee's On Their Without Enough Staff, my appeal was denied on 9/23/21 the reason states " After 2nd review your unable to substantiate allegations however Exops Supt will be advised of your Grievanced issue. My Next appointment, I was actually transported to the Dermatology Unit (4<sup>th</sup> floor) at John H Stroger, Jr. Hospital of Cook County, A lady took a look at these Dark Colored Spots then, took out a little tool that was shaped like a tube, and quick pressed it on the largest and darkest spots and pressed down, the tool took a sample of the spots, she lined the hole were the sample came from with foam and placed an band aid over it, she told me that she was going to send the sample to the lab for testing, she also took pictures and uploaded them to my medical file, she told me I would have an appointment in a couple of weeks. A couple of weeks later on 10/22/21 I was transported back to the Dermatology ~~unit~~ unit, the lady who took the sample along with a male doctor told me after looking closely they narrowed it down to a couple of things but nothing makes sense but it being (Lichen Striatus), They said it could be my skin is allergic to something in my environment or something I'm eating or a medication I'm taking, I asked them to do a second test but I still haven't heard anything, when I returned back to Cook County Cermak Div 8 that day, I was seen by a Black older female doctor, who I asked for a second opinion she told me I would have to tell the Doctor in my Div, when I was finally called to see John Doe Div 9 Doctor again, I told him about my visit at Stroger's and asked him for a

Statement of Claim PAGE 9 J. Cully 2019/11/18/604

Referral to get another opinion, John Doe DR Doctor Stated "No you get your Answer I will not be sending you back out wasting County money", I then stated I did not have thesees problems Before Coming to DR 9 and being Stripped of my Cotton Blanket, He told me that He Was Not Sending me out and He Bet 98 percent Of Men In Cook County Would ~~prefer~~ a Cotton Blanket over Wool And that Its Not his Job to Get Me A Cotton Blanket, I Explained to him what I was told and he told me Your Not Allegre to Wool Because I Would be Allegre to my own Skin, To this Date I have yet Got A Second opinion on theses Dark (purpleish) Spots on my thigh.

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V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Monetary Compensation two million dollars, better treatment (Medical) for Present and future Detainee's at CCDOC. Simple basic rights and Services for those Detained the right to be treated fairly and the right to get a Second opinion by a different Doctor, and to be treated (Cared for) in a timely manner and an outside agency that in place to hold CCDOC accountable for all of their actions

VI. The plaintiff demands that the case be tried by a jury.  YES  NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 7<sup>th</sup> day of October, 2022

Jordan Curry  
(Signature of plaintiff or plaintiffs)

Jordan Jala Curry  
(Print name)

Z01911181104  
(I.D. Number)

2700 S. California Ave Chicago IL 60608  
(Address)

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Pro Seiner Correspondent, United States  
District Court, 219 S. Dearborn Street 20<sup>th</sup> floor  
Chicago IL 60604

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